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### **BY E-MAIL ONLY**

To: Patrick Sturdy, Esq.  
Cummings, McClorey, Davis & Acho, P.L.C.  
33900 Schoolcraft Road  
Livonia, Michigan 48150

From: Nemer N. Hadous

Date: November 21, 2011

Pages: 2 + Enclosures

**Re: *Saad, et al., v. City of Dearborn Heights, et al.***  
Plaintiffs' Second Requests for Production of Documents

### **Dear Mr. Sturdy,**

We have reviewed our Second Requests for Production of Documents and offer the following comments.

Regarding Request No. 24, we assume we will be provided with copies of the requisite insurance agreements (in full).

Regarding Request Nos. 25 – 26, we rely on your assertion that no other citizen complaints regarding any of the individual Defendants exist save for the two citizen complaints you will be providing to us per Order of the Court.

Regarding Request Nos. 27 – 32, we request production of these documents as they do not appear to have been provided to us by any earlier discovery response. This discovery is relevant to our *Monell* claims. Identical discovery has been ordered by the Court in previous matters. *Cessante v. City of Pontiac* (Case No. 07-15250).

We will be providing you with Plaintiffs' supplemental responses to Defendants' interrogatories later this week.

November 21, 2011

In the meantime, please do not hesitate to contact me or Mr. Faraj should you have any questions regarding the foregoing.

**Cordially,**

**/s/Nemer N. Hadous**

|AZ: 027529 | CA: 264431|

United States Courts:

- Sixth Circuit Court of Appeals
- District of Arizona
- Eastern District of Michigan